

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WISCONSIN

In the Matter of:

In Bankruptcy No.
15-10302-7

CALEB J. HIGGINBOTHAM,

Debtor.

**TRUSTEE'S OBJECTION TO MOTION FOR RELIEF FROM STAY
AND ABANDONMENT**

The Trustee, William J. Rameker, by his counsel, William J. Rameker and Mark P. Maciolek of Murphy Desmond S.C., hereby objects to the Motion for Relief from Stay and Abandonment of Associated Bank, N.A. and respectfully requests the Court to schedule a hearing on the Motion. In support of his objection, the Trustee states:

1. The Motion does not provide any evidence of value, and therefore the Trustee is unable to determine if there is equity in the subject property and whether or not the Movant is impaired.

2. Because the Debtor has not yet filed Schedules, and the Section 341 Meeting of Creditors has not been held, the Trustee has not had an opportunity to review the Schedules or examine the Debtor.

WHEREFORE, the Trustee respectfully requests the Court to schedule a hearing on the Motion.

Dated this 12th day of February, 2015.

MURPHY DESMOND S.C.

Attorneys for Trustee

By: 

William J. Rameker

State Bar No. 1011327

Mark P. Maciolek

State Bar No. 1054208

33 East Main Street Suite 500

P.O. Box 2038

Madison, WI 53701-2038

(608) 257-7181